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U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSE RAMON CISNEROS PEREZ,

Defendant.

INDICTMENT

18 U.S.C. § 2251(a) & (e)

18 U.S.C. § 2252(a)(2) & (b)

18 U.S.C. § 2252(a)(4)(B) & (b)(2)

The Grand Jury charges that

COUNT I

Between on or about February 26, 2020, and on or about March 2, 2020, in the District of Nebraska and elsewhere, the defendant, JOSE RAMON CISNEROS PEREZ, did knowingly use, persuade, induce, entice, and coerce, and attempt to use, persuade, induce, entice, and coerce a minor, VICTIM 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the defendant knew and had reason to know that the visual depiction would be transported in interstate commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT II

Between on or about November 27, 2020, and on or about November 28, 2020, in the District of Nebraska and elsewhere, the defendant, JOSE RAMON CISNEROS PEREZ, did knowingly use, persuade, induce, entice, and coerce, and attempt to use, persuade, induce, entice, and coerce a minor, VICTIM 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the defendant knew and had reason to know that the visual depiction would be transported in interstate commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT III

Between or about February 26, 2020, and December 9, 2020, in the District of Nebraska and elsewhere, the defendant, JOSE RAMON CISNEROS PEREZ, did knowingly receive and attempt to receive, using any means and facility of interstate and foreign commerce, any visual depiction, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct and such visual depiction being of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(2) and (b).

COUNT IV


On or about December 9, 2020, in the District of Nebraska, the defendant, JOSE RAMON CISNEROS PEREZ, did knowingly possess one or more computer file and other matter which contained an image of child pornography, including image of children under the age of 12 years old, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct and such visual depiction being of such conduct, and said computer files and other matter had been shipped or transported in interstate commerce by any means, including by computer.

In violation of Title 18, United States Code Section 2252(a)(4)(B) and (b)(2).

A TRUE BILL

FORERPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

  
Kelli L. Ceraolo  
Assistant U.S. Attorney